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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

2 | IN RE: JUUL LABS, INC., MARKETING,  
3 | SALES PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION

Case No. 3:19-md-02913-WHO

## **ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED**

5 | THIS DOCUMENT RELATES TO:

6           *Cole Aragona v. Juul Labs, Inc., et al.*,  
7           Case No. 3:20-cv-1928;  
8           *Jordan Dupree v. JUUL LABS, INC., et al.*,  
9           Case No. 3:20-cv-03850;  
10          *Kaitlyn Fay v. JUUL LABS, INC., et al.*,  
11          Case No. 3:19-cv-07934;  
12          *Jennifer Lane v. JUUL LABS, INC., et al.*,  
13          Case No. 3:20-cv-04661;  
14          *Bailey Legacki v. JUUL LABS, INC., et al.*,  
15          Case No. 3:20-cv-01927;  
16          *Walker McKnight v. JUUL LABS, INC., et al.*,  
17          Case No. 3:20-cv-02600;  
18          *Carson Sedgwick v. JUUL LABS, INC., et al.*,  
19          Case No. 3:20-cv-03882;  
20          *Ben Shapiro v. JUUL LABS, INC., et al.*,  
21          Case No. 3:19-cv-07428; and  
22          *Matthew Tortorici v. JUUL LABS, INC., et*  
23          *al.*, Case No. 3:20-cv-03847

1 **TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

2 PLEASE TAKE NOTICE that Defendants Hoyoung Huh, Nicholas Pritzker, and Riaz  
 3 Valani (the “Non-Management Directors”) will and hereby do move the Court, pursuant to Civil  
 4 Local Rule 79-5(f), for an administrative order to consider whether another party’s material  
 5 contained in the following documents should be sealed:

- 6 • The unredacted version of Exhibit A: Plaintiff’s Second Supplemental and Amended  
 7 Responses to Defendant JUUL Lab Inc.’s First Set of Interrogatories to Plaintiff Cole  
 8 Aragona;
- 9 • The unredacted version of Exhibit B: Plaintiff’s Second Supplemental and Amended  
 10 Responses to Defendant JUUL Lab Inc.’s First Set of Requests for Production of  
 11 Documents to Plaintiff Cole Aragona; and
- 12 • The unredacted version of Exhibit C: Plaintiff Cole Aragona’s Amended Plaintiff Fact  
 13 Sheet.

14 The Non-Management Directors file this motion pursuant to the Amended Protective  
 15 Order (ECF No. 1282) and Civil Local Rule 79-5(f). Pursuant to Civil Local Rules 79-5 and 7-  
 16(c), no hearing date has been set.

17 **Material to Be Considered for Sealing**

18 The Parties have designated materials contained and referred to in the above-referenced  
 19 filings as confidential and highly confidential under the Amended Protective Order (ECF No.  
 20 1282).

21 Subsection (f) of Local Rule 79-5 sets forth procedures that apply when a party seeks to  
 22 file information designated as confidential by another party or non-party. This Administrative  
 23 Motion is based on the Parties’ designation of certain information as confidential, highly-  
 24 confidential – attorneys’ eyes only, or highly confidential under the protective orders entered in  
 25 this action. Under Local Rule 79-5(f)(3), the Designating Parties have seven days to file a  
 26 statement or declaration establishing that the material warrants sealing.

27 For the foregoing reasons, the Non-Management Directors respectfully requests that this  
 28 Court provisionally seal Exhibits A, B, and C.

29 The following attachments accompany this Motion:

1. The Declaration of Michael J. Guzman in Support of the Administrative Motion to  
2. Consider Whether Another Party's Material Should Be Sealed;
3. Exhibit A: Plaintiff's Second Supplemental and Amended Responses to Defendant  
4. JUUL Lab Inc.'s First Set of Interrogatories to Plaintiff Cole Aragona, to be filed  
5. provisionally under seal;
6. Exhibit B: Plaintiff's Second Supplemental and Amended Responses to Defendant  
7. JUUL Lab Inc.'s First Set of Requests for Production of Documents to Plaintiff  
8. Cole Aragona, to be filed provisionally under seal;
9. Exhibit C: Plaintiff Cole Aragona's Amended Plaintiff Fact Sheet, to be filed  
10. provisionally under seal; and
11. 5. A Proposed Order granting the Administrative Motion to Consider Whether  
12. Another Party's Material Should Be Sealed.

13  
14 DATED: January 22, 2025

Respectfully submitted,

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16 By: /s/ Michael J. Guzman

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